

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 0412164 MLW

ERIC SOUVANNAKANE,	)
Plaintiff	)
	)
v.	)
	)
SEARS ROEBUCK & CO., WILLIAM SULLIVAN	)
RICHARD SPELLMAN, BARBARA TAGLIARINO,	)
KEVIN SULLIVAN, ALICIA COVIELLO,	)
GARY MANSFIELD,	)
Defendants	)
_____	)

**JOINT STATEMENT**

Pursuant to Local Rule 16.1(D) and this Court's Notice of Scheduling Conference, the parties hereby report to the Court as follows:

I. AGENDA FOR SCHEDULING CONFERENCE

The parties suggest the following agenda of matters to be discussed at the conference:

- a. The proposed scheduling plan for discovery and motions;
- b. The positions of the parties regarding settlement;
- c. Pending motions before the court;

II. COMPLIANCE WITH LOCAL RULE 16.1(D)

- A. Automatic Disclosures pursuant to Rule 26 and the Local Rules will be served no later than two weeks after the Initial Scheduling Conference;
- B. Fact Discovery will end on June 21, 2006;
- C. Plaintiff will disclose his expert(s) by August 21, 2006;

- D. Defendant will disclose its expert(s) by September 21, 2006;
- E. All Expert Depositions shall be completed by October 23, 2006;
- F. Dispositive Motions:

Dispositive Motions shall be filed by November 24, 2006

Responses to dispositive motions will be filed by December 21, 2006

Oral Argument on the motions will take place before January 22, 2007 or such other time as the Court deems appropriate.

- G. Pretrial Conference:

The parties request a pretrial conference after a decision on the dispositive motions.

The parties suggest February 21, 2007 with trial scheduled in the weeks following.

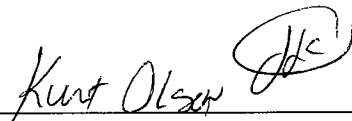
IV. CERTIFICATIONS:

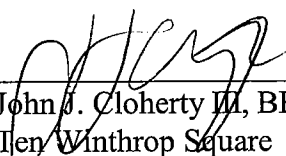
Certifications required by L.R. 16.1(D)(3) are being filed separately with the court.

Respectfully Submitted,  
The Plaintiff,  
ERIC SOUVANNAKANE,  
By his Attorneys,

The Defendant,  
GARY MANSFIELD,  
By his Attorneys,

**PIERCE, DAVIS & PERRITANO, LLP**

  
Kurt S. Olson, BBO#  
500 Federal Street  
Andover, MA 01810  
(978) 681-0800

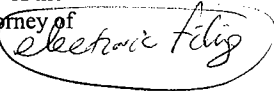
  
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The Defendant,  
SEARS ROEBUCK & CO., ET AL  
By its Attorneys,

*Christine Netski* 

Christine M. Netski, BBO#  
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CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the  
above document was served upon each attorney of  
record, or pro se litigant, by ~~mail~~ by hand. 

8/26/05  
Date

